

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

MARLON SALO HERNANDEZ CARRANZA,

Plaintiff,

v.

GLORIA MARISOL RAMIREZ, *et al.*,

Defendants.

Civil Action No. 8:20-CV-02687-
PWG

Dated: February 16, 2022

PLAINTIFF’S MOTION FOR AN AWARD OF ATTORNEY’S FEES AND COSTS

Plaintiff, Marlon Salo Hernandez Carranza, as the prevailing party in this matter moves for a judgment of attorneys’ fees and costs incurred in this litigation, against Defendants Gloria Marisol Ramirez, L&R General Services LLC, and Fidel A. Granados.

Plaintiff seeks \$27,763.00 in attorney’s fees and \$911.58 in costs, less any attorneys’ fees and costs already paid to Plaintiff by Defendant Bainbridge Mid-Atlantic Construction LLC (“Bainbridge II”) (which has since been dismissed from the case voluntarily by Plaintiff pursuant to a confidential settlement agreement). Plaintiff relies upon the Memorandum in Support of Plaintiff’s Motion for Attorney’s Fees and Costs attached hereto and Exhibits A-G.

WHEREFORE, Plaintiff respectfully requests that this Court award reasonable attorneys’ fees and costs associated with this litigation in the amounts sought herein, less any amounts already paid to Plaintiff by Defendant Bainbridge II towards attorneys’ fees and costs and reduce its award to judgment in favor of Plaintiff and against Defendants Gloria Marisol Ramirez, L&R General Services LLC, and Fidel A. Granados, jointly and severally.

A proposed order is attached.

Respectfully Submitted,

/s/Andrew Balashov

Andrew Balashov
Maryland Bar No. 19715
MELEHY & ASSOCIATES, LLC
8403 Colesville Rd., Suite 610
Silver Spring, MD 20910
Telephone: (301) 587-6364
Facsimile: (301) 587-6308
Email: abalashov@melehyllaw.com
Attorneys for Plaintiff